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Dedicated to a better Brisbane

26 July 2022

Director, Disability and Transport Standards, Land Transport Policy
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
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Dear Sir/Madam

Thank you for the opportunity to comment on the Consultation Regulation Impact Statement (RIS) on Stage 2 of the reforms of the Disability Standards for Accessible Public Transport 2002 (Transport Standards) released in March 2022. Brisbane City Council (Council) notes the RIS covers 54 aspects.

Council has provided responses to the questions posed on those aspects that are relevant as a provider and operator of an extensive public transport network in Brisbane.

Council continues to plan and deliver improvements to the accessibility of its transport network for all. This consists of the management and operation of a network that currently includes:

- more than 6000 bus stops
- more than 1200 buses
- 29 ferry vessels
- 22 ferry terminals

Council's Vision for Brisbane is for an accessible and connected city. This is further expressed in Council's strategic documents including *A City for Everyone: Inclusive Brisbane Plan 2019-2029* and the *Transport Plan for Brisbane – Strategic Directions* (Transport Plan).

These documents express Council's intent for Brisbane to be a city where everyone can move around safely and easily, and for the transport network to meet the needs of all users by providing equitable, affordable and accessible transport options. This includes planning, designing and operating public transport infrastructure in accordance with universal accessibility principles and provisions of the Transport Standards.

Council is keen to ensure that the reform of the Transport Standards will assist in achieving greater clarity of the accessibility requirements and improve consistency across the public transport networks and to provide a desirable journey experience for all users. Notwithstanding this, the Transport Standards need to provide for flexibility in providing access solutions as there are situations where 'one size' does not fit all.

Council looks forward to continuing to work with the Australian and Queensland Governments in the reform and implementation of the Transport Standards to improve access for people with disability.

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If you wish to discuss Council's submission, please contact [redacted] Policy, Strategy and Planning Manager, Transport Planning and Operations, on [redacted] or via email at [redacted]@brisbane.qld.gov.au.

Yours sincerely

[redacted]

Colin Jensen
CHIEF EXECUTIVE OFFICER

Encl: Comments on the consultation regulation impact statement

COMMENTS ON THE CONSULTATION REGULATION IMPACT STATEMENT

Part 1 – Transport Standards principles

Consultation questions:

1. Reporting

Summary

There are no requirements to report data on compliance with the Transport Standards and no nationally consistent compliance data currently exists. Without a nationally consistent reporting framework the lack of data to monitor compliance will continue.

No.	Question	Response
1.	How could the impact on you change if compliance data is reported for sections of the Transport Standards (regulatory option 2) or for whole transport assets (regulatory option 3)	Reporting on whole transport assets (regulatory option 3) is likely to be more workable and efficient for large local governments compared to reporting on identified sections of the Transport Standards, as organisational structures and processes tend to be built around asset classes (e.g. bus stops). Option 3 may require more reporting.
2.	What is your preferred option: • status quo • non-regulatory option or • regulatory option 1, 2 or 3? Why?	Regulatory options are preferred as they provide legal certainty for both providers and clients. Regulatory option 3 would provide a good outcome for users of transport services/infrastructure in terms of access to consistent, clear information around transport assets they use. Regulatory option 3 is preferred because it would ensure data reported is consistent and that disability users are able to access consistent, relevant information.
3.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Improved reporting, particularly through regulatory options, is assumed to increase accountability and transparency, and indirectly ensure that people with disability would be able to access public transport without discrimination. As currently written, the options will rely on the proposed national framework for reporting to provide the clarity on whether the intended outcomes will be achieved.

		Compliance dates or compliance plans for existing public transport infrastructure and conveyances needs to be established to achieve the intended outcome of accessible public transport. Regulatory options would provide greater clarity.
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of any option?	All options will be challenged by terms such as co-design and universal access. There is a risk of not being able to successfully establish a shared meaning and understanding of these terms. The more reporting that is needed, the more resources/time needed, and cost incurred. It is likely there will be challenges with collecting data, accuracy of data cost/resourcing for data collection and determining responsibility to collect data.
5.	Would you provide compliance data to the Australian Government if it was discretionary?	It is likely that compliance data is provided. It would be preferred that there is transparency ahead of time with how the data is going to be used so that it can be presented in the most suitable manner.
6.	What is your experience reporting on public transport accessibility (if applicable)?	Council currently report on compliance levels and number of upgrades in the network.
7.	Do you think compliance data on the Transport Standards should be made public? If yes, what would you use the data for?	Depending on the format that the reporting/data is captured, there is potential to use public data (such as Open Data sources) to be consumed by digital applications that allow people to be able to better plan their journeys. One source of data could: 1. provide seamless travel between various local government authorities and states governments 2. consolidate or redirect resources from other existing data/information management processes and streamline with the new reporting mechanism. There could be a fear or reluctance to provide public access to data, which may increase the potential risk of litigation rather than encouraging greater transparency and accountability which acknowledges the constraints faced by many operators/providers.
	Any other comment?	If data is made publicly available, consider how equivalent access processes and end-user reporting could be presented. With some careful consideration, implementation, and potentially curation, there is opportunity to capture and

		share information and insights from people with lived experience of disability. (Note: the RIS partly addresses this in the Equivalent Access section. Based on the assumption that no transport standard can prescribe how to satisfy or meet the needs of all disabilities, reliable, open information on equivalent access can provide best practice examples, and even be potentially accessed and applied outside of public transport services and the disability community. Consider reporting on trends in complaints that may reveal priorities for service providers and future improvements of legislation.

2. Equivalent access

Summary

Public transport operators and providers may be reluctant to use equivalent access provisions – while they provide the flexibility to use innovative solutions to achieve an equivalent level of accessibility, operators don't have certainty that the solution complies with the Transport Standards. Reviewing the current provisions aims to provide the assurance and flexibility to develop solutions that are fit-for-purpose and non-discriminatory.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	The regulatory option for equivalent access solutions, with built in process of co-design, would allow for innovative, responsive solutions outside of the 'Deemed to Satisfy' specifications that will result in best practice solutions ahead of legislative changes in a rapidly evolving context. However, it may not lend itself to determining suitable, custom solutions on a case-by-case basis. Non-regulatory would allow providers to see how others are providing workable solutions and encourage consistency in use of successful approaches.
2.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	In the main, this is the case. Additional information describing engagement and/or co-design process could be included, along with key skills and attributes of facilitators and certifiers. Both help to ensure clarity but it will still likely depend on the specific application of equivalent access for different circumstances.

3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	While co-design and equivalent access processes will be a large shift for many, there will also be a huge attitudinal and cultural change to how things are done that matters to people with disability. One challenge will be for project management processes to allow enough time for co-design to be planned and implemented well, as well as associated certification processes, when arriving at 'equivalent access'. Another challenge will be compensation of time for people with a disability to participate and provide knowledge in co-design and equivalent access solutions. Will compensation be set and managed by individual providers and operators, resulting in variable compensation values and methods, or will a schedule of rates be provided through the Transport Standards? If compensation is standardised and regulated, what are the consequences beyond public transport, for the engagement and compensation for other forms of community engagement and consultation? Regulatory compliance may reduce flexibility in design and construction, e.g. every bus stop site has different constraints which sometimes require unique solutions. A challenge with 'status quo' arrangements is that providers will still have uncertainty as to whether their equivalent access arrangements are acceptable.
4.	Have you been involved in developing equivalent access solutions? Have these been successful?	Yes. It is hard to measure 'success' but the solutions are workable and have not resulted in complaints. For example, Tactile Ground Surface Indicator (TGSI) distance from kerb at bus stops is different to that prescribed in TransLink's Public Transport Infrastructure Manual (PTIM) so that it can work with the ramps on the bus fleet.
5.	Does Transport Standards section 33.3 Equivalent access, provide sufficient clarity and guidance in relation to consultation requirements?	No, it is devoid of 'co-design' as part of the process providing 'equivalent solutions' and does not provide certainty as to whether equivalent access options will be accepted as compliant.
6.	The proposed performance solutions process (regulatory option) involves professional certifiers signing-off alternative access proposals. What qualifications and/or attributes should certifiers possess before they undertake this work?	Certifiers will need a high-level understanding of: • the *Disability Discrimination Act 1992* (DDA) and its intent • universal access that promotes the value of benefits for all rather than some

		• equivalent access as an 'experience' as opposed to achieving 'deemed to satisfy' standards • safety • what constitutes robust and representative engagement.
7.	What has been your experience applying equivalent access solutions?	See Q 4 response.
8.	Would you accept alternative accessible solutions if the development of proposed solutions included adequate consultation and participation with the disability community?	Yes
9.	Do you currently use the equivalent access provision provided at Transport Standards: section 33.3 Equivalent access?	Yes

Part 2 – Information, communication and wayfinding

Consultation questions:

5. Better communication of accessibility features

Summary

There is no national consistency on the definition of accessibility and what accessibility amenities and features are available. This leads to accessibility meaning different things to a wide range of people, depending on their individual needs. There is an opportunity to develop nationally consistent terminology that can be applied across all modes of public transport, and a baseline list of accessible features.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvement upon the status quo is supported. The disability community advocates for better and more detailed information regarding accessibility features at public facilities. However, there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clarity for operators and providers and provide for a more predictable experience for the user. A non-regulatory approach would allow for innovative solutions to be developed that best meet the customers' needs and respects the practical limitations faced by operators and providers. Notwithstanding which option is chosen, there will need to be consistent terminology and comprehensive guidance material to assist operators/providers and users.
2.	Do the non-regulatory and regulatory option/s provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	The Transport Standards need to consider how to communicate the accessibility features that benefit invisible and hidden disabilities. For example, allocated priority seating signage focuses on mobility impairments which are easier to depict in graphical form.

		Improved clarity and guidance are needed for a consistent approach across networks. It is important that, in regard to information, communication and other aspects of potential reform for the Transport Standards, there is sufficient focus on people with intellectual impairment.
3.	Are there any challenges (i.e., physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	There are challenges for all options. Where a regulatory solution is chosen the following need consideration: • data and management systems require a level of nation-wide standardisation • timing and resourcing for data collection and management across jurisdictions may be additional for operators/providers. A non-regulatory solution may not: • provide the necessary impetus for operators/providers to provide access across networks consistently to benefit the user • address the issue of a number of third-party digital platforms attempting to fill the gap in information with an inconsistent and piecemeal effect • achieve consistency across local government areas resulting in an inability for users to trust information and adequately plan their journeys or experience. There will be other challenges associated with providing information that reflects options such as whether the application of equivalent access is applied and communicating how accessibility features benefit invisible and hidden disabilities. Regardless of the option, comprehensive guidance and other support will need to be provided to operators and providers.
4.	In your experience, has the communication of accessibility features been effective?	Accessibility features and the need for these features may not be well understood across all users/customers.

5.	How do you define the term 'accessible'?	According to Council's *A City for Everyone: Inclusive Brisbane Plan 2019-2029* an accessible city is one where people of all ages, abilities and backgrounds can travel, work, live, enjoy and connect. With a growing population, disability and mental health issues will become more common. This includes instances of intellectual, cognitive, sight, hearing and mobility impairment.
6.	What accessibility terms work for all modes to best communicate accessibility, noting that scenarios/locations can change the level of accessibility?	A range of accessibility terms would assist in better communication. This, however, would require acceptance of compliance against Transport Standards and the application of equivalent access. Care needs to be taken with regard to the legal implications of the use of terminology regarding accessibility and compliance.

6. Timely provision of information

Summary
There is no requirement for accessible public transport information to be provided in a preferred format and in a timely manner. Timely and accessible information ensures people with disability have confidence to use public transport. There is an opportunity to clarify the requirements concerning the provision of accessible public transport information when a request is made for information in a preferred format.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvement upon the status quo is supported, however, there is no one-size-fits-all solution. Council provides information on services in accordance with the requirements of customer service information of TransLink. If a regulatory option is selected, the increased regulation of the provision of information is likely to be costly and resource intensive. Consideration needs to be given where providers have large, multi-modal networks to plan, manage and operate and reasonable implementation timeframes and flexibility that meets the needs of customers.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Council will be led by TransLink with respect to the format of information regarding services. Council appreciates the benefits of information in a range of formats.

		New requirements for information in multiple formats could have timing and resourcing implications. Consideration needs to be given to practical applications on different parts of large transport networks. Notwithstanding whether a regulatory or nonregulatory option is selected, guidance and assistance will be required for operators and providers.
5.	Do you get requests for service-related information in formats that are not readily available? If so, how is this managed until the preferred format request for information has been fulfilled?	Passenger Information Displays (PIDs) at bus stops have been requested from customers. These are investigated on a case-by-case basis and subject to upgrade considerations across an extensive network of over 6000 bus stops.

7. Real time communication

<u>Summary</u>

There is no requirement for real time communication between operators and providers and people with disability. This leads to situations where passengers may not be able to communicate with staff or exchange information in real time. There is an opportunity to improve communication by including real time communication requirements.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvements to the status quo is supported, however, consideration needs to be given to the fact that no one-size solution will fit all circumstances. If a non-regulatory option is selected, this could allow for greater flexibility to adapt to different systems, locations and customer needs, infrastructure and service types.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Challenges associated with real time communication include: • data/information may need to come from various sources and may be inconsistent across services/providers • some environments may be challenging due to the nature of operations/infrastructure – e.g. marine environments • cost to implement • resources needed to anticipate and provide communication which meets all customer requirements when/where they need it.

8. Passenger location during journey

Summary

Arrival and next stop information is not always available or accessible to people with disability using public transport. There is an opportunity to ensure all public transport users are given access to the same level of information on their location during their journey, specifically arrival and next stop information.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why? If you prefer the regulatory option, which sub-option do you prefer? Why?	Improvement to the status quo is supported for all users. Regardless of whether a regulatory or non-regulatory option is selected, a 'one-size-fits-all' approach is unlikely to be workable.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Retrofitting cost for onboard real time passenger information is likely to be prohibitive and would be more suited to new buses and ferries only. If digital displays are being provided for an improved passenger experience, these will need to be supported by GPS/wayfinding technology. Some commercial wayfinding technologies don't support road infrastructure solutions that are dedicated to bus operations only. This includes busways, bus lanes, bus slip lanes and dedicated bus stop infrastructure. To implement next stop announcements, development of commercial GPS solutions will be required to support accurate public transport solutions. Clarity may be required to assist manufacturers and operators to understand what circumstances require visual display information to be duplicated or augmented with audible information. Digital displays need to be managed at network level with a live link to actual services or in such a way that people can read next services as well as look and plan ahead. The supportable lifespan of digital information equipment compared to the (longer) expected lifespan of vehicles may necessitate upgrade or replacement

		of the equipment one or more times during the life of the vehicle. This may introduce additional asset maintenance/lifecycle costs. Ferries operate in a harsh marine environment so there may be challenges in durability as well as connectivity to live information.
4.	In your experience, have you been able to access arrival and next stop information when using public transport in ways that best meet your needs?	Council has received positive feedback from stakeholders in relation to a current trial of real time passenger information including next stop announcements on the City Loop Services via audio and visual messaging on the bus.
	Any other comment?	The benefits associated with digital announcements and 'next stop' information provided via audio and visual messaging will improve the passenger experience and improve the efficiency of the service for all passengers. Digital displays can provide real time updates on services providing a greater level of service and manages expectations of passengers.

9. Hearing augmentation on conveyances

Summary

Provisions in the Transport Standards do not provide equitable access to information to people who are deaf or who use hearing aids and are on-board conveyances. Passengers with hearing impairments may be unable to see a visual display or miss or misunderstand system messages. There is an opportunity to provide improved hearing augmentation systems that cover a greater area of the interior space of a conveyance.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvement to the status quo is supported. Regardless of whether a regulatory or non-regulatory option is selected, a 'one-size-fits-all' approach is unlikely to be workable. Operators and providers have different challenges in regard to physical constraints and the needs of their customers.

2.	If you prefer the regulatory option, which sub-options do you prefer? Why?	The option selected should account for limitations such as electrical interference which results in 100% coverage not being able to be achieved (for example option 2, sub-option 2).
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Hearing augmentation appears to be outdated technology with many persons who use hearing aids not having the ability to connect. Public announcements provided via visual display screens is replacing this technology and should be considered to be an acceptable alternative. Additionally, some electric buses may generate significant interference with some hearing augmentation systems whereby they do not work.
5.	In your experience, have hearing augmentation systems on public transport conveyances been adequately accessible?	Current hearing augmentation systems fitted to Council buses do not have 100% coverage within the passenger area.

10. Hearing augmentation: Infrastructure and premises

Summary

There is a reference to a dated standard on hearing augmentation in infrastructure and premises that is inferior to the requirements of the Premises Standard. There is an opportunity to improve the provision of hearing augmentation systems in premises and infrastructure, in line with the Premises Standard.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why? If you prefer the regulatory proposal, which option do you prefer? Why?	Improvement to the status quo is supported for all users. Regardless of whether a regulatory or non-regulatory option is selected, a 'one-size-fits-all' approach is unlikely to be workable. Operators and providers have different challenges in regard to physical constraints and the needs of their customers, particularly in regard to the marine environment.

3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implantation of the requirements of any option?	The marine environment for ferry networks may complicate installation and effectiveness of hearing augmentation.
4.	Do hearing augmentation systems in public transport infrastructure or premises have sufficient area coverage?	Hearing augmentation is not currently provided at ferry terminals or at bus stops.

11. Print size and format

Summary

Existing requirements for large print are not best practice and do not meet the varying needs of people with low vision or other print disabilities. There is an opportunity to include specific font weight and text justification requirements for larger print where the legibility of products and services can be improved by increasing the size of the letters and layout of materials.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Regardless of whether a regulatory or non-regulatory option is selected, a 'one-size-fits-all' approach may not to be workable. Operators and providers may have different challenges in regard to physical constraints and the needs of their customers, for example, if a significant volume of text needs to be displayed at stops/ terminals. Non-regulatory solutions can potentially provide flexibility in reaching the desired outcome. Regulatory solutions can help to ensure consistency across networks and a better journey experience for the customer. Comprehensive guidance and support would assist in developing solutions.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Challenges are associated with print font size include the following. • The production and retention of printed material in different colours is not practical and is very expensive given the low levels of demand. • Detailed and dense public transport service timetables may not be able to be printed at required print size format on static displays. Alterative solutions may be needed in these instances. • In some unique cases regulatory standards may not be met.

		• There could be resource and time implications for changing format to information. • Changes to specifications regarding public information would require an increase in set-up and replacement costs, as well as ongoing maintenance and production costs. • The implications of a regulatory approach to these forms are distinct especially in relation to cost and practical space constraints. Electronic means of providing information provide for more options and bespoke applications. • Given major issues with producing public information at constrained bus stops, a regulatory requirement may simply result in an inability to provide any or only very basic information at a bus stop. It would be impossible to provide the information at easily accessible eye levels. Where it could be accommodated, this would require more printing for the same information and would generate increases in costs.
4.	What has been your experience reading signs in a public transport context? Have you been unable to read a sign due to letter height and/or formatting?	Council has received some complaints from public transport users that there is too much information on the timetables. Conversely, there have also been complaints that simplified timetables are confusing and not adequate.

12. International symbol for access and deafness

Summary
The current reference is to an old Australian Standard. There is an opportunity to update and align requirements with contemporary Australian Standards for the provision of international symbols and lettering sizes for accessibility and deafness.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why? If you prefer the regulatory option, which sub-option do you prefer? Why?	Improvement to the status quo is supported. Regardless of whether a regulatory or non-regulatory option is selected, a 'one-size-fits-all' approach may not to be workable.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Given the vast network of public transport facilities, replacing or updating signs with updated symbols can be costly.

13. Letter heights and luminance contrast of signs

Summary
The Transport Standards lack clarity regarding font type and luminance contrast, and do not provide certainty that signage design will be consistent and accessible to people with disability. There is an opportunity to simplify and clarify requirements concerning letter heights and luminance contrast of static, non-braille or non-tactile signs.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why? If you prefer the regulatory proposal, which option do you prefer? Why?	Improvement to the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers and a more predictable experience for the user. Option 2, sub-option 2 provides the greatest certainty for sign design. A non-regulatory approach, however, would allow for innovative solutions to be developed that best meet the customers' needs and account for practical limitations faced by operators and providers. Notwithstanding which options is chosen there will need to be consistent comprehensive guidance material to assist operators/providers and users including best practice examples and alternatives to back-lit lighting.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenges include the capacity constraints of existing infrastructure or conveyances to upgrade to new standards. New standards to be retrofitted to existing infrastructure and conveyances can be difficult and resourcing intensive to retrofit. Further, it can be difficult to read a bus stop sign from far away in a bus, also hard to see at night if no lighting (not all bus stops have lighting nearby).

14. Locations of signs

Summary

The reference to the Australian Standard is over 30 years old. While there is no evidence to suggest the requirements are not fit-for-purpose, there is an opportunity to update and simplify the requirements for signage location on conveyances and infrastructure and in premises to assist operators and providers in meeting their obligations to provide accessible public transport services.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why? If you prefer the regulatory proposal, which sub-option do you prefer? Why?	Improvement to the status quo is supported to improve the user experience. If a regulatory solution is selected this could provide further clarity. If a non-regulatory option is selected, this could provide operators with the ability to update and make changes to signs as required. Existing infrastructure and conveyances do not all have capacity for signs. Regardless of whether a regulatory or non-regulatory option is selected, consideration should be given to the possibility that there is no one-size-fits-all solution. Operators and providers have different challenges in regard to physical constraints and the needs of their customers and placemaking opportunities for precincts may impact signage consistency.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	There are challenges in regard to installing signs on infrastructure due to factors including weight. Current standards for a variety of signage throughout the transport network and urban realm for a variety of different modes or where driven by a particular marketing approach does not assist with consistent or clear messaging to navigate a journey.

15. Braille embossed (printed) specifications

Summary

There is a lack of clarity on the standard of braille required for use in the provision of public transport information to people with vision impairment which presents challenges to braille readers. There is an opportunity to clearly specify the requirement for use of braille, raised lettering or symbols.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why? If you prefer the regulatory proposal, which option do you prefer? Why?	Improvement to the status quo is supported to improve the user experience. If a regulatory solution is selected this could provide further clarity and consistency. If a non-regulatory option is selected, this could provide operators with the ability to update to new standards. Regardless of whether a regulatory or non-regulatory option is selected, consideration should be given to the possibility that there is no one-size-fits-all solution. Operators and providers have different challenges in regard to physical constraints and the needs of their customers.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenges will include the following: • retrofitting infrastructure to meet the new standards which will come at a cost • it may not be possible to meet the Transport Standards in all situations • capacity within existing conveyances is limited such that the requirements may not be met.
	Any other comment?	Full specifications of braille and raised tactile signage requirements needs to be covered in the Transport Standards Guidelines. Also, whenever braille is provided then tactile lettering must also be provided and should not be optional.

16. Braille and tactile lettering for signage

Summary
The Transport Standards contain inconsistent braille requirements and this presents challenges to braille readers. There is an opportunity to clearly define the braille and tactile signage requirements and design standards to reflect braille best practice and align these with related requirements under the Premises Standards.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvement to the status quo is supported to improve the user experience. If a regulatory solution is selected this could provide further clarity and consistency in the Transport Standards including other related standards including the Australian Braille Authority Standards. If a non-regulatory option is selected, this could provide operators with the ability to update to new standards. Regardless of whether a regulatory or non-regulatory option is selected, consideration should be given to the possibility that there is no one-size-fits-all solution. Operators and providers have different challenges in regard to physical constraints and the needs of their customers.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenges will include the following: • retrofitting existing infrastructure to meet the new standards would likely incur a cost • there will be physical limitations for infrastructure with regard to the provision of signs in appropriate locations. Alternative options may also provide for improved accessibility (including bumps at the end of handrails and digital options for timetables).
	Any other comment?	Full specifications of braille and raised tactile signage requirements needs to be covered in the Transport Standards Guidelines. Also, whenever braille is provided then tactile lettering must also be provided and should not be optional.

17. Lifts – Braille and tactile information at lift landings

Summary

There is inadequate provision of wayfinding information at lift landings which presents a barrier to independent travel for people with vision impairment and/or hearing impairment. There is an opportunity to ensure that people with disability can continue their journey by providing braille and tactile wayfinding information on lift landings and door frames.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvement to the status quo is supported to improve the user experience. If a regulatory solution is selected this could provide further clarity and consistency of Transport Standards. If a non-regulatory option is selected, this could provide operators with the ability to update to new standards. In regard to existing lifts, retrofitting new systems is likely to be costly. Regardless of whether a regulatory or non-regulatory option is selected, consideration should be given to the possibility that there is no one-size-fits-all solution. Operators and providers have different challenges in regard to physical constraints and the needs of their customers.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Some existing 'lift cars' may not be able to accommodate a new system without substantial modification costs.

18. Lifts – Audible wayfinding

Summary

People with vision or cognitive impairments are sometimes uncertain about which landing a lift car has arrived at and/or which way they need go to continue their journey. There is an opportunity to enhance lift accessibility by ensuring that audio announcements are provided at all lift levels and that directional audible wayfinding information is available at lift landings.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option 1 or 2, or regulatory option 1 or 2? Why?	Improvement to the status quo is supported to improve the user experience.

		If a regulatory solution is selected this could provide further clarity and consistency of Transport Standards. If a non-regulatory option is selected, this could provide operators with the ability to update to new standards. Refitting existing lifts with new systems may incur significant costs. Regardless of whether a regulatory or non-regulatory option is selected, consideration should be given to the possibility that there is no one-size-fits-all solution. Operators and providers have different challenges in regard to physical constraints and the needs of their customers.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Some existing 'lift cars' may not be able to accommodate a new system without substantial modification costs.

19. Lifts – Emergency communication systems in lift cars

Summary
People who are deaf, hard of hearing, speech impaired or non-verbal are at risk of being unable to communicate the need for assistance during an emergency. There is an opportunity to enhance lift accessibility through the provision of adequate emergency communications systems in lift cars.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvement to the status quo is supported to improve the user experience. If a regulatory solution is selected this could provide further clarity and consistency of Transport Standards. It would also improve the safety of passengers.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Upgrading lift systems may not be possible and likely to be costly.

20. Lifts – Reference for lift car communication and information system

Summary

People who are hard of hearing – and particularly those who also have vision impairments – do not always receive equal access to information while travelling in lift cars when compared to other passengers. There is an opportunity to provide assistive listening systems in lifts and update technical references that deal with assistive listening systems to take into account technological advances.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Improvement to the status quo is supported to improve the user experience. If a regulatory solution is selected this could provide further clarity and consistency of Transport Standards. It would also improve the safety of passengers. If a non-regulatory approach is taken this could provide flexible solutions for existing infrastructure.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Upgrading lift systems may not be possible and likely to be costly.

Part 3 – Accessibility at stations, stops, wharves and access routes

Consultation questions:

25. Continuous accessibility on access paths

Summary

The requirements for continuous accessibility reference a dated standard, and are not aligned with the Premises Standards. There is an opportunity to provide standalone requirements for continuous accessibility on access paths that are more closely aligned with the Premises Standards, whilst maintaining the rights of people with disability.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	While the prescriptive nature of the regulatory option would provide clarity, the non-regulatory approach with best practice guidelines, would support consideration of suitable end-to-end trip solutions which may incorporate innovations to enhance the customer experience.
2.	Do the non-regulatory and regulatory option/s provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Suitable guidelines will be needed with non-regulatory option to ensure the necessary clarity.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Depending on the extent of pathway determined as necessary to achieve accessibility requirements, this could be a considerable undertaking in terms of cost and time. Guidelines will assist providers in delivering the desirable outcomes for the community.
5.	What features make a path connecting transport nodes accessible?	Features such as grade, width, materials, condition and signage contribute to path accessibility.
	Any other comment?	Clarification between different sections of AS1428.2-1992 is required. AS1428.2-1992 (2015 revision) notes that sec8.1 (a) notes walkways, ramps and landing shall have an unobstructed width of not less than 1200mm, while AS1428.1-2021, sec 3.3 Width of a continuous accessible path of travel, notes that the continuous accessible path of travel shall be 1000mm.

27. Resting points

Summary

There are no requirements to provide an allocated space for a wheelchair or similar mobility aid at a resting point, inhibiting the ability of people who use mobility aids to rest along access paths. There is an opportunity to ensure resting points are available for people who use mobility aids by providing an allocated space.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	While the prescriptive nature of the regulatory option would provide greater clarity and certainty, the non-regulatory approach with best practice guidelines would support consideration of suitable solutions which may incorporate innovations to enhance the customer experience.
2.	Do the non-regulatory and regulatory option/s provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Suitable guidelines will be needed with non-regulatory option to ensure the necessary clarity.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Not all sites will be suitable for provision of rest points due to topography or other constraints.

29. Location of fare system elements

Summary

There is limited clarity regarding the specific location of fare system elements, which may lead to an inconsistent and potentially inaccessible travel experience that prevents some people travelling independently. There is an opportunity to clarify the accessibility requirements for the location of fare system elements by simplifying and co-locating these requirements in a new section.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	Any change that reduces risk of inconsistent interpretation of requirements would be supported.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Any requirements should consider the need to manage fare evasion.

30. Allocated spaces and priority seating in waiting areas

Summary

The Transport Standards do not provide sufficient clarity on the proportion of allocated spaces and priority seating required in a waiting area that provides seats. This may lead to the proportion of allocated spaces and priority seating provided in each waiting area to be insufficient. There is an opportunity to provide clarity on the proportion of allocated spaces and priority seating required in a waiting area and specifically address uncertainty on how a single bench seat should be designated as priority, and to clarify the nature and extent of a waiting area.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory or regulatory option? Why?	While the prescriptive nature of the regulatory option would provide greater clarity and certainty, the non-regulatory approach with best practice guidelines would support consideration of suitable solutions which may incorporate innovations to enhance the customer experience.
2.	Do the non-regulatory and regulatory option/s provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Yes, if non-regulatory guidance is followed.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	There may be time and cost implications for retrofitting of existing infrastructure.

34. Lift specifications and enhancements

Summary

The existing lift accessibility requirements reference a dated standard that does not take into account technological advances in accessibility features that are increasingly being installed as standard practice. There is an opportunity to update the referenced standard to reflect technological advances and improvements in lift specifications and enhancements.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Regulatory is preferred to provide clarity around compliance.

36. Poles, objects and luminance contrast

Summary

There is no specified point of reference for measuring or calculating luminance contrast in the Transport Standards. There is an opportunity to include a reference to the Australian Standards that provides a methodology for measuring and calculating luminance contrast and to identify surfaces that require sufficient luminance contrast with objects, in alignment with the Premises Standards.

No.	Question	Response
1.	What is your preferred option; status quo, non-regulatory, regulatory option 1 or regulatory option 2 (including the sub-options for each)? Why?	While the prescriptive nature of the regulatory option would provide greater clarity and certainty, the non-regulatory approach with best practice guidelines would support consideration of suitable solutions which may incorporate innovations and adaptation to enhance the customer experience. Non-regulatory with additional guidance would be beneficial to practitioners, whilst allowing flexibility in the approach taken in accounting for the environment that the infrastructure exists in. Public realm design is a multi-facetted discipline that needs to account for all aspects of the community, including amenity, accessibility, constructability and maintainability. A regulated approach may be too restrictive and end up preventing or causing the abandonment of facilities and infrastructure that potentially would benefit the community.
2.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Yes, if non-regulatory guidance is followed.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Potential challenges include: • technical barriers due to existing environment or infrastructure • conflict with/impact on other uses – e.g. distraction to road users if inappropriate infrastructure (colour, intrusion, etc.) is used in areas adjacent to the road • time and cost burden to implement or to gain ‘professional guidance’ in challenging locations.

	Any other comment?	Emergency Call Points are coloured blue which is a distinct colour helping them to stand out. Guidelines for colour/contrast selection would provide more predictable outcomes for end users.

37. Lighting

Summary

The Transport Standards requirements for lighting do not provide adequate guidance for lighting designers to deliver appropriate lighting solutions. Effective and functional lighting is critical to ensuring safe, comfortable and accessible journeys for all passengers. There is an opportunity to update lighting requirements to ensure public transport environments deliver effective and functional lighting solutions that are appropriate for the diverse and nuanced requirements of people with disability, while meeting the unique safety, contextual and operational requirements appropriate to their context.

No.	Question	Response
1.	What is your preferred option; status quo, non-regulatory or regulatory option 1, 2, 3 or 4? Why?	Both non-regulatory and regulatory options would improve the status quo. Regulatory option 4 provides clarity and will provide a prescriptive method of achieving uniformity of lighting. There is also the direct reference to ASNZS4282 (2019) which will reduce issues of public transport lighting having a negative impact on biota, important for sensitive environments. Regulatory option 2 provides the minimum benefit for people of all abilities so that they experience independence and inclusion. All options should consider the continuous accessible path of travel as an unenclosed zone. Non-regulatory provides specific and useful guidance that can be implemented at the discretion of the operator. It will be important to ensure that any changes to standards/guidelines are clear as to how they will work with other standards and guidelines in relation to lighting – e.g. light pollution for wildlife and Crime Prevention Through Environmental Design (CPTED) principles.

2.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	The non-regulatory option with provision and use of appropriate guidance is likely to provide sufficient clarity. The regulatory option may be over-prescriptive which may not achieve the desired outcomes.
3.	Do you think the referenced Australian Standards are adequate to achieve the desired outcome? If not, why?	Largely however, guidance will be needed for non-regulatory option. The Australian Standards are adequate if they are read in full including the context of why lighting levels are required needs to be understood and at times this is buried in the notes of the Australian Standards. E.g. AS1428.2:1992 Clause 19.1 – Note 3 - For people with impaired hearing, a level of illumination of not less than 150 lx, without glare, is needed to allow for lip reading. Additionally, the position of the lighting makes a huge difference for not only people with a disability, but in general. Again, this is buried in the AS notes. E.g. AS1428.2:1992 Clause 19.2 – Note 1 – Overhead lighting is preferred.
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Potential challenges include: • cost/resources for auditing and implementation • site-specific challenges and constraints • resident objections to lighting impacts • improvements may not be possible at some locations without extensive modifications • conflict with/impact on other uses – e.g. distraction to road users if inappropriate infrastructure (colour, intrusion, etc.) is used in areas adjacent to the road.
	Any other comment?	There are a number of standards, reports and other documentation that are relevant to lighting and have the potential to complicate application and implementation. Any endeavour to make it as clear as possible how these should/could be applied, e.g. through guidance, would help ensure better outcomes.

Part 4 – Accessibility of boarding and alighting and egress of infrastructure

Consultation questions:

38. Signals and process for requesting boarding devices

Summary

Existing requirements for signals or other processes for requesting boarding assistance are not sufficiently explicit and the reference to the Australian Standard is dated. People who are hearing impaired or deaf are at a disadvantage when communication systems require verbal interaction. There is an opportunity to clarify the requirements for signals and other processes for requesting boarding assistance, and to update the reference to Australian Standards to reflect the use of modern technology.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option (including relevant sub-options)? Why?	Improvement upon the status quo is supported. However, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers and a more predictable experience for the user. However, a non-regulatory approach would allow for innovative solutions to be developed that best meet the customers' needs and account for practical limitations faced by operators and providers. In particular, flexibility may be needed depending upon the location and the needs of the users. Systems that use modern technology may be able to assist. Notwithstanding which option is chosen there will need to be consistent comprehensive guidance material to assist operators/providers and users.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option? Have you, or your passenger, ever had difficulties boarding a conveyance or disembarking at your stop due to an inability to request a boarding ramp?	There may be challenges associated with retrofitting new solutions into existing public transport infrastructure.

	a. What was the nature of the fault? For example: the ramp did not arrive or was late, staff failure to communicate effectively, poorly located or broken controls? b. What was the consequence?	

39. Notification by passenger of need for boarding device

Summary

There is no requirement specified for advanced notice or booking for passengers needing access to a boarding device, and the requirements for passengers requesting boarding devices at infrastructure and in premises are conflated with the requirements relating to on board conveyances. There is an opportunity to clarify the need for passengers to have flexible options when notifying operators and providers of a need for a boarding device and update the Australian Standards reference to reflect the use of modern technology.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option (including the sub-options for unbooked services and calls and control buttons)? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers and a more predictable experience for the user. However, a non-regulatory approach would allow for innovative solutions to be developed that best meet the customers' needs and account for practical limitations faced by operators and providers. In particular, flexibility may be needed depending upon the location and the needs of the users. Currently, staff assist people to board ferry vessels from ferry terminals. Notwithstanding which options is chosen there will need to be consistent comprehensive guidance material to assist operators/providers and users.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	There may be a challenge for implementing a reliable solution between a ferry vessel and terminal in a dynamic marine environment.

40. Portable boarding ramp edge barriers

Summary

There is an absence of a clear requirement for portable boarding ramps to have edge barriers, which poses a risk to the safety and confidence of people who use mobility aids when travelling on public transport. There is an opportunity to provide a clear requirement for all portable boarding ramps to have edge barriers.

No.	Question	Response
1.	What is your preferred option; status quo, non-regulatory or regulatory option 1, 2 or 3? Why?	Improvement upon the status quo is supported. However, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers and minimise risks and improve safety for users. Notwithstanding which options is chosen there will need to be consistent comprehensive guidance material to assist operators/providers and users.

41. Boarding ramp and removable gangway definitions

Summary

There is an absence of a clear requirement for portable boarding ramps to have edge barriers, which poses a risk to the safety and confidence of people who use mobility aids when travelling on public transport. There is an opportunity to provide a clear requirement for all portable boarding ramps to have edge barriers.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers and minimum requirements to ensure user safety on gangplanks.

		Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	It may not be possible to meet the minimum standards to provide a practical solution for gangplanks. Ferry terminals operate in a marine environment with a number of factors influencing boarding accessibility and gangplank (boarding ramp) slope and stability. Differential freeboard height between a given pontoon and vessel is influenced by: • base difference in vessel freeboards • number of passengers and distribution onboard (load) • level of fuel, water, waste water • pontoon freeboard (minor difference terminal to terminal) • wave action during boarding activity. For these reasons there needs to be a guide which includes tolerances that recognise the dynamic marine environment. It should be noted that the term gangways may actually refer to gangplanks and the correct terminology should be used in the Transport Standards and any associated guidance to avoid confusion.
4.	Would you be supportive of a definitional distinction between boarding ramps and removable gangways? Can you explain why or why not?	Definitional distinction between boarding ramps and removable gangways would assist, however, the standards need to recognise that, with regard to ferry terminals, the environment is not stable or constant and boarding requires supervised assistance.

42. Removable gangway design — ferries

Summary
As there is currently no differentiation between vehicle boarding ramps and removable gangways for vessels, the specifications for gangway design are not fit for purpose and do not reflect a dynamic operating marine environment. There is an opportunity to provide clarity for public transport operators and providers on the design specifications for removable gangways.

No.	Question	Response
1.	To what extent does the issue impact you?	This proposal does impact Council as the provider of extensive ferry services in Brisbane involving 50 gangplanks. Changes to standards may require modifications which may need to be tested in regard to their effectiveness. This terminology should be corrected to gangplanks as they are manoeuvrable ramps to access ferries and terminals, not gangways.
2.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers. Standards need to clarify the distinction between gangplanks and gangways (static and articulated). Considerations also need to be given to incorporating safety barriers onto gangplanks. Notwithstanding which option is chosen there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
3.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	As stated above, clarity is needed in relation to gangways (static and articulated) and gangplanks.
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenge for operators and providers is that not all marine facilities can support an articulated gangway. These features are substantial pieces of infrastructure and not practical for small facilities.

43. Nominated assistance boarding points

Summary

It can be difficult for people with disability to know where to seek direct boarding assistance, and public transport staff may experience trouble locating people with disability when they require direct assistance. There is an opportunity to provide clarity about where and how customers with disability can seek timely boarding assistance, provision of a boarding ramp and direction to accessible facilities.

No.	Question	Response
1.	To what extent does the issue impact you?	Council's ferry operator provides boarding assistance from the ferry terminal to the ferry vessel.
2.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is taken and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers. Staff training on Direct Assistance procedures is of high importance and should consider issues of staff turnover and/or recruitment to ensure procedures are maintained and delivered to a high standard. Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
3.	Of the sub options in regulatory option 1, which of the proposed list of facilities should be identified or marked as accessible?	If a regulatory option is selected it is important to ensure that all elements that are accessible are marked as such.
5.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Technological advances will continue to improve the way that passengers can board and disembark independently through automation of ramps and doors. However, there is a risk of over-reliance on technology to replace Direct Assistance from staff.

44. Mobility boarding points on infrastructure — identification of lead stops

Summary

Poorly identified lead stops create challenges for people with disability in service recognition, moving to the appropriate location on the platform and hailing the driver. There is an opportunity to provide technical specifications for the identification of lead stops to ensure people with disability can identify these at bus stations, bus interchanges and in bus zones.

No.	Question	Response
1.	To what extent does the issue impact you?	If required, this could involve additional costs and resourcing for Council with regard to bus stops.

2.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is taken and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers and provide an improved journey experience for users. Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	This proposal may result in additional implementation costs and ongoing maintenance.

45. Pontoon boarding points on infrastructure

Summary

Boarding points are required to have a firm and level surface where boarding devices can be deployed, however, there is uncertainty on the definition of firm and level in relation to pontoon boarding points as these are affected by wash, wave and wind action. There is an opportunity to acknowledge that pontoons are located in a dynamic marine environment, and their design must allow for maximum stability to ensure people with disability can board and alight ferries safely.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is taken and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers and provide an improved journey experience for users. A regulatory approach, however, will need to allow for flexibility to adapt to changing circumstances within the marine environment in regard to ferry services. Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenge for the provision of ferry services is the dynamic nature of the marine environment and the effect on the boarding point between the ferry terminal and ferry vessel. A level surface may not be able to be provided. The gangplank assists in this regard between the pontoon and the vessel.
5.	In your experience as a passenger or as an operator / provider, what generally causes ferry pontoons to be unstable during boarding and alighting?	The challenges as a ferry service provided and operator are due to the marine environment, including: • tidal and wind/weather conditions • wash from passing vessels • distance vessel is tied up from pontoon • differential of freeboard heights • passenger/fuel/sullage load and pontoon ballast.

46. Bus, tram and light rail boarding points on infrastructure

Summary

Large gradient and cross fall changes between bus stops and roads can reduce accessibility for people with disability, and make boarding and alighting from conveyances unsafe. There is an opportunity to ensure that wherever possible, boarding points on buses, light rail and trams are made accessible by including clear gradient and cross fall specifications.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why? a. For the regulatory option, do you prefer sub-option 1 or 2?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is taken and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers. Consideration needs to be given to steep sites in regard to bus stops. A non-regulatory approach, however, would allow for innovative solutions to be developed that best meet customers' needs and account for practical limitations faced by operators and providers, such as slopes. Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users. This is particularly important in regard to recognising bus stop infrastructure installed in areas with steep topography.
2.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Further information in regard to usage levels, cost benefit analysis and feasibility would provide further clarity to operators/providers.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	One of the greatest challenges for Council as a provider and operator of bus services is the hilly terrain and the ability to provide accessible bus stops. Site-specific constraints can mean compliance is difficult/not possible to achieve in some cases due to topography, verge width, underground services, trees or other verge infrastructure. The cost of making bus stops compliant can be significant.

48. Accessible taxi ranks

Summary

There are no specific requirements for accessible taxi ranks, which creates challenges for people who use wheelchairs and drivers of wheelchair accessible taxis when using taxi ranks. There is an opportunity to include accessibility requirements for taxi ranks to ensure they are fit-for-purpose and accessible to mobility aid users.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is taken and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers. Consideration needs to be given to steep sites in regard to bus stops. A non-regulatory approach, however, would allow for innovative solutions to be developed that best meet customers' needs and account for practical limitations faced by operators and providers. This would provide the opportunity for Council to prioritise and implement accessible taxi rank improvements based on demand and the operational requirements of ranks. Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
2.	For the non-regulatory and regulatory options, do you prefer sub option 1, 2 or 3?	If a regulatory option is selected, sub-option 2 will allow for accessible taxis to service pickup and drop-offs from either end of the rank based on operational demand. There are some high-capacity ranks, particularly in the CBD and at major venues, where providing multiple accessible access points may not improve access to wheelchair accessible taxis.
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The following are considered challenges in implementation: • providing information on the location and operating time of accessible taxi ranks is a major component of providing increased access for people with disability, however, responsibly for this task is not clearly defined • high-demand taxi ranks where taxis queue could limit the ability for wheelchair accessible taxis to access nominated spaces, particularly in longer ranks where multiple mid-rank spaces could be provided

		• if these spaces can only provide for wheelchair-accessible taxis, then they can impact on the efficient operation of the rank allowing taxis to join at the tail of the queue and move forward along the kerbside • the availability of wheelchair-accessible taxis to service these ranks will continue to be a primary factor in the ability for services to be provided in a timely manner.

49. Accessible passenger loading zones on-street

Summary

Many passenger loading zones are not fit-for-purpose as boarding points for wheelchair accessible taxis and small conveyances, as they are inaccessible to people using wheelchairs or other mobility aids. There is an opportunity to recognise on-street passenger loading zones as boarding points to assist rear loading of wheelchair accessible taxis and ensure people with disability using wheelchairs or other mobility aids can safely traverse over a kerb onto the footpath.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is taken and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for operators and providers. A non-regulatory approach, however, would allow for innovative solutions to be developed that best meet customers' needs and account for practical limitations faced by operators and providers. In some instances, passenger loading zones may not be able to be provided in close proximity to new ferry terminals. Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
2.	For the non-regulatory and regulatory options do you prefer: a. Sub-option 1: the first and last vehicle space must be accessible b. Sub-option 2: the first, second and last vehicle space must be accessible c. Sub-option 3: where there are more than five spaces the first and last vehicle space must be accessible. In addition, one space for every four spaces between the first and last space must be accessible.	Whatever solution is proposed, the standards need to consider the following: • not all spaces will be able to provide the number required, particularly where kerbside space is limited • there needs to be consistency with the road rules • the solution will need to be supported by signs and road markings.
3.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Further clarification is sought in regard to: • alignment with the road rules • style of parking (e.g. in-line or angled) • the requirements for design drawings

		• marking and symbols to be required.
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenges are expected to include: • potential for low turn-over of spaces • compliance issues and the ability of the road authorities to enforce • limited capacity in some locations • competing road rules and standards such as AS1749 • education of road users regarding use and need for these spaces.

50. Accessible parking spaces in infrastructure off-street carparks

Summary

There are no requirements for off-street parking areas associated with public transport infrastructure, or specifications for accessible parking spaces or the access paths connecting them to accessible entrances. There is an opportunity to set requirements for off-street parking areas to provide accessible parking spaces that are in close proximity to building entrances with room to manoeuvre, load and unload, and are clearly identified as accessible.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why? a. Of the sub-options proposed in the regulatory option which do you prefer?	Improvement upon the status quo is supported however, it needs to be considered that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clarity for operators and providers and provide for a more predictable experience for the user. In the case of car parking however, flexibility is needed as car parking may not always be able to be provided. For example at a new ferry terminal or a neighbourhood bus stop.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	Council does not seek to provide car parking at bus stops or ferry terminals. Car parking facilities tend to be provided at bus and rail stations which are the responsibility of TransLink and typically located outside the inner city to avoid unnecessary car trips.

Part 5 – Accessibility in conveyances

Consultation questions:

51. Grabrails on access paths

Summary

There is no requirement or guidance to provide grab-rails along access paths on board conveyances, which poses a risk to the safety of people with ambulant disabilities using public transport. There is an opportunity to improve accessibility along conveyance access paths by providing grab-rails that have sufficient luminance contrast.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for manufacturers and operators and provide for a more predictable experience for the user. Notwithstanding which option is chosen, there will need to be consistent, comprehensive guidance material to assist operators/providers and users.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	A challenge for bus providers is to provide grab rails in appropriate locations of the vehicle which may be in a head impact zone. In this regard, the grab rails may need to be padded.

52. Grabrails on allocated spaces

Summary

There is insufficient guidance and clarity on the layout of grab-rails in allocated spaces, and no requirement for grab-rails to have sufficient luminance contrast, which poses a safety risk to people with vision impairment using public transport. There is an opportunity to provide clarity on the layout of allocated spaces across different modes of transport to allow for differences in position, and include requirements on the minimum luminance contrast for grab-rails.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist with ensuring consistency across networks of multiple jurisdictions, providing clear guidance for manufacturers and operators and provide for a more predictable experience for the user.
2.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Yes
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	A particular challenge for bus providers is providing features that all users can use. Where side-facing flip up seats are provided in spaces allocated for mobility devices, then the grab-rail design needs to be functional and safe for both configurations. Further, grab-rail designs need to consider the different requirements of users. For example, some users may not have equal usage of both hands or arms.

53. Mobility aid movement in allocated spaces: passive restraints

Summary

Requirements to contain the movement of mobility devices in allocated spaces are currently inadequate, which presents a risk to the safety of people travelling with mobility aids as these can topple or slide due to displacement forces that occur during transit. There is an opportunity to provide more defined requirements for the containment of mobility aids in allocated spaces on conveyances.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported, however, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist by removing the ambiguity associated with the current guidelines and the risk of not complying with the Transport Standards.
2.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	It is not clear that the options will address the current issue of no national standard for mobility devices. People who purchase mobility devices expect that their mobility device can access public transport. Unfortunately, there are physical limitations on the size of the vehicle entry, space between the wheel arch and the load rating of the access ramp. With no national standard there is also no maximum limit on mobility device dimensions and manoeuvrability. Therefore, it isn't possible for all mobility devices that are currently available on the Australian market to access allocated spaces on public transport. There is insufficient length at 1300 mm for the allocated space to suit larger mobility devices. A length between 1500-1600 mm would be more suitable. A standard needs to be developed that defines the requirements for mobility devices that are suitable for travel on public transport.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenge for Council as a provider of buses and ferries relates to the provision of restraints for mobility aids on board. Currently Council buses and ferries have a front passive restraint (known in the industry as an Ironing Board) and side wall passive restraint (flip-up seats). There is also the handrail on the

		window ledge to provide additional lateral support. No active restraints are currently fitted to any Council buses or ferries. Council believes that passive restraints provide a better overall experience for all passengers compared to active restraints in an urban bus fleet. The passive restraints provided are an effective measure to prevent mobility device movement on the front and wall side of the bus. However, movement of the mobility device to the aisle side of the bus can occur particularly for passengers who do not have sufficient upper body and arm strength to brace themselves with the handrail on the window ledge. Anecdotal feedback suggests mobility device users do not always position their device in the correct location or orientation for the passive restraints to be effective. This increases the risk of the mobility device moving, particularly when forward facing in the current fleet configuration. Council has invested significant design effort and engagement with bus manufacturers and stakeholders to develop an effective passive restraint for the aisle side of the allocated spaces. There is currently not a suitable restraint on the market and hence Council is currently developing a solution. Issues impacting the feasibility of an effective passive restraint include: • adjacent aisle-side passive restraints protruding into the aisle and prevent mobility devices accessing the allocated space • huge diversity of mobility device types and sizes with no standard currently available that defines the requirements of mobility devices that are suitable for public transport travel • lack of space for manoeuvring mobility devices.
4.	What experiences have you had with wheelchair or scooter safety in allocated spaces on buses, trams, light rail and ferries? a. Have you, or your passenger, ever slid or toppled? If so, could you describe the experience? b. Have you, or your passenger, ever had difficulty manoeuvring into an allocated space due to the location or design of restraints systems? Could you describe the experience and outcome?	Council regularly carries mobility devices on services and the majority of these trips are safe and incident free. However, there have been some incidents where a device has tipped over or slid when the bus negotiated a corner or roundabout. Despite several trials, no alternate device or aid has been successful in reducing the risk, maintaining current levels of accessibility and being retrofittable to the fleet.

	c. Have you ever been deterred from using public transport due to safety concerns related to mobility aid safety?	
	Any other comment?	Council driver training focuses on smooth, safe driving and customer service. Signage is also fitted to buses to show the correct orientation and placement of mobility devices for optimal safety in transit. Mobility device users are also advised (via signage) to apply the brake of the device. Driver training and appropriate signage should also be considered in this reform.

54. Mobility aid movement in allocated spaces: active restraints

Summary

There is a lack of clarity on the technical requirements for active restraints, and when and where the provision of active restraints is required. There is an opportunity to prescribe a national standard for a minimum level of safety and amenity for active restraints for mobility aids in allocated spaces on conveyances. This includes mandatory safety belts, and to provide a definition for active restraining systems.

No.	Question	Response
1.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Council supports the status quo that is active restraints are not currently fitted to any Council buses or ferries. Council believes that passive restraints provide a better overall experience for all passengers compared to active restraints in an urban bus fleet while maintaining the travel efficiencies of a public transport system.
3.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The fitting of active restraint systems results in the increase in dwell times required to fit and remove active restraints which is one key consideration which impacts on-time running of public transport. Additionally, most active restraint systems cannot be fitted by the user and hence require driver assistance which impacts the user's independence and personal space. These devices can also introduce unintended risks such as slip, trip and choke hazards for passengers.

		Retrofitting of active restraint systems in buses is costly as there is insufficient sub-floor or wall structure to use as anchorage mounts. This requires the floorboards of the bus to be removed to add additional structure at significant expense. Hence, retrofitting is not a practical or feasible option.

60. Doorway contrast and height

Summary

There are no set requirements for the minimum safe height and luminance contrast of doorways on conveyances, which poses a safety risk for head strikes. There is an opportunity to set minimum safe height and luminance contrast requirements for solid and glazed doors, and to harmonise these requirements with the Premises Standards.

No.	Question	Response
1.	To what extent does the issue impact you?	Council has experienced minimal impacts regrading doorway contrast and height.
2.	What is your preferred option: status quo, non-regulatory option, or the regulatory option? Why?	Improvement upon the status quo is supported. Council supports the introduction of luminance contrast strips to define the location of all doors on buses to aid identification by users. However, consideration should be given to the possibility that there is no one-size-fits-all solution. If a regulatory approach is selected and developed effectively it could assist by providing clarity to operators and providers.
3.	Do the non-regulatory and regulatory options provide enough clarity to ensure people with disability would be able to access public transport without discrimination?	Yes
4.	Are there any challenges (i.e. physical, technical, operational, etc.) that could impact the implementation of the requirements of any option?	The challenge for operators and providers is to ensure that luminous contrast strips on glazed doors do not compromise the driver's field of view when looking to the kerb side of the bus. Council is currently trialling luminous contrast strips on the Brisbane Metro Pilot Vehicle.

Part 6 – Implementation approach

Consultation questions:

61. Implementation approach

Summary

Any agreed regulatory changes to the Transport Standards will require an implementation approach so stakeholders have certainty on the compliance obligations of public transport operators and providers. There is an opportunity to develop a compliance plan for implementing any revised Transport Standards with fit-for-purpose provisions and mechanisms to manage the compliance of existing assets.

No.	Question	Response
1.	Have target dates for compliance in Transport Standards, Schedule 1 target dates for compliance been successful in bringing compliance to public transport assets?	The target dates have allowed service and infrastructure providers to plan for implementation over a set period of time. While this hasn't eliminated costs or challenges associated with achieving compliance, it has allowed planning for appropriate allocations in budgets to facilitate works.
2.	What are the challenges and benefits to achieving compliance for existing assets under Transport Standards schedule 1 target dates for compliance?	Challenges have included the size and scale of public transport infrastructure (e.g. more than 6000 bus stops in Brisbane) and to manage site and topography challenges and community objections while trying to achieve the target dates. Benefits have largely been the impetus to improve access and safety to meet the target dates (which means there has been significant progress over time).
3.	What is your preferred option: implementation option 1, 2 or 3? Why?	Option 3 is preferred as this would allow for prioritising and funding of upgrades to be coordinated with other works (e.g. road corridor upgrades, development).
4.	Where you have been unable to reach full compliance under the Transport Standards what mechanisms have you used to provide accessibility for public transport users?	When full compliance is not possible, partial compliance has been met along with consultation and provision of equivalent access and/or noting for unjustifiable hardship as appropriate.
5.	Is there sufficient clarity around when the triggers outlined in the Transport Standards section 32.1. Effect and application of these Standards are activated and when an existing asset should comply with the new requirements?	Yes

6.	What impact does enforcement of target dates (or lack of enforcement) have on the success of using a schedule mechanism to reach compliance? a. How does this impact accessibility of public transport?	It is not clear how/if enforcement has been applied to date, so it is difficult to comment on impact/success.